

# Code of Conduct

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How do we conduct ourselves and why? This is a crucial question which directly relates to the identity and ambitions of our company: who are we and who do we want to be?

Zwanenberg Food Group is a family business founded in 1929. Theodorus van der Laan, a butcher from The Hague, came up with the great idea of canning meat. After the war his son Aat saw opportunities to export the preserves to a great number of countries. Aat was my grandfather: a hard-working and entrepreneurial man of integrity. Three characteristics that ought to be central to our actions in 2023 as well, and that will guide us in taking any difficult business decisions.

This Code is about the way we do business. We act with integrity towards clients, colleagues and other stakeholders, led by our values and standards, while respecting and providing equal opportunities for all.

Sjoerd van der Laan  
CEO

## Introduction

**This Code of Conduct applies to Zwanenberg.** Together with its subsidiaries and partners, Zwanenberg is committed to high standards regarding compliance with applicable law, rules and regulations and ethical business conduct.

**This Code of Conduct applies to everyone Zwanenberg chooses to work with.**

This Code sets forth the major principles that should guide the business conduct of all employees, suppliers and other parties involved.

Employees are expected to communicate, and adhere to, this Code of Conduct. They are strongly encouraged to speak up in case they notice or suspect a violation of this Code of Conduct. (This includes Zwanenberg's employees, external employees as well as employees of suppliers or other parties.)

In this Code the term 'suppliers' also includes any (sub)contractors, vendors, agents, consultants or any party supplying or delivering goods or services to Zwanenberg. All suppliers are expected to adhere to the standards in this Code of Conduct as well as national and international law.

**'We' means: you and us both.** As business partners we are impacted by each other's conduct. Only together are we able to take proper responsibility for the people that work with us, for the (natural) resources that we manage, harvest, trade and use, and for ethical business practices. Everyone is therefore held to the same high standards, and wherever you read 'we' it means: you and us both.

*This Code is part of all agreements between Zwanenberg and suppliers. Prior to the existence of the Code of Conduct, Zwanenberg required all its suppliers to underwrite the Ethical Trading Initiative (ETI) Base Code<sup>1</sup> at the start of the relation with Zwanenberg as part of its 'General conditions'. This Code of Conduct is based on the same principles as the ETI Base Code. The guidelines in this Code are non-negotiable and should be viewed as minimum standards. As this Code cannot address all issues and circumstances that may arise, common sense and personal ethical standards in line with the spirit of this Code are required.*

<sup>1</sup> [The Ethical Trading Initiative Base Code](#)

## How to treat people

Zwanenberg is committed to a fair and equal workplace for everybody, and considers mutual respect as self-evident. Zwanenberg wants employees to feel valued for their contributions at work, and adheres to the United Nations' Universal Declaration of Human Rights.<sup>2</sup>

Inappropriate behaviour has a harmful impact on the work environment: it can negatively affect the health, self-confidence and performance of employees, and can therefore also potentially disrupt the quality of Zwanenberg's services. Every Zwanenberg employee, and anyone they come in contact with as part of their jobs, is expected to contribute to a safe and respectful working environment. Aggression, violence, mistreatment, ignorance, intimidation, or sexual harassment is unacceptable. Bullying, threatening behaviour, or making statements that could harm the company and/or colleagues is unacceptable. Everyone should be treated equally regardless of race, colour, national origin, religion, sex, gender identification, sexual orientation, age, disability, marital status or political views and discrimination based on these or any other grounds prohibited by law is unacceptable.

In the unfortunate event of an employee experiencing or witnessing any inappropriate behaviour towards another person in the workplace, there are several possible courses of action at Zwanenberg. Employees can directly address the person in question and make them aware of their behaviour and how it may adversely impact others. If they do not feel comfortable to speak up and address the matter themselves, employees are encouraged to contact the confidant or HR and report to them. Suppliers are required to have similar procedures in place.

<sup>2</sup> *Universal Declaration of Human Rights, United Nations*



## How to treat people

Zwanenberg acknowledges the rights of employees and workers, and adheres to applicable rules that protect their wellbeing and best interest. Suppliers are held to the same standards:

- **Only freely chosen labour**

Always adhere to local labour law and ensure employment is freely chosen and not forced or trafficked. Workers will not have obtained employment by paying employment fees nor will they be required to lodge deposits or their identity papers with their employer and they are free to leave with due observance of a reasonable notice period.

- **Only legally permissible labour**

All employees including agency workers, without exception, have to be legally allowed to work in the country where they are employed. When recruiting, passports or other legally accepted proof of identity has to be reviewed and returned to the employees.

- **Restrictions to underage labour**

It is strictly prohibited to recruit individuals below the age of 15 or below the age for compulsory schooling (whichever is higher). Age must be verified by passports or other legally accepted proof of identity. Employees below the age of 18 may not be employed at night, nor will they be required to perform work that is physically or mentally hazardous. Children who are found to be performing child labour must be provided with access to high quality education until they are no longer a child.

- **Clear communication about wages**

Remuneration meets at least the legal minimum standards or industry benchmark standards (whichever is higher) and will be communicated

clearly with workers in an understandable manner and in written form before they enter employment. Employees will also receive a wage specification in written form for each payment. Deductions from wages other than legally allowed or as a disciplinary measure are not permitted.

- **Freedom of association**

Employees are free to form or join a legally recognised trade union or any other employee organisation that represents their collective interests to establish constructive dialogue and bargain in good faith with the union on employment conditions. This will not result in any form of discrimination, reprisal or harassment.

Employees will not be hindered in carrying out representative functions at the workplace.

- **Occupational health & safety**

All work is organised and practiced in such a way that the performance of work does not pose a threat to the health of personnel or third parties, or causes damage to the environment. All risks in regard to working conditions are assessed, identified with the right tools, and managed effectively (meaning hazards are either removed, or reduced to an acceptable level). This includes mandatory safety instructions before entering production facilities. Accidents are prevented by organisational and technical measures and increased safety awareness. Physically demanding work is reduced as part of the vitality and sustainable employability programme.

## How to treat resources

### Ensuring food quality and safety

Zwanenberg is dedicated to providing high quality, safe food to our customers. To ensure food quality throughout the supply chain, all suppliers are required to be GFSI certified (for example BRC, IFS) and to use a Hazard Analysis Critical Control Points (HACCP) system, in line with EU regulation. All employees dealing with products must be properly trained to be aware of these rules and must adhere to them.



Employees monitor performance and, if necessary, take corrective action to ensure product quality meets market expectations. Employees proactively report any issues regarding product quality to line managers. In circumstances where safety or quality standards are not met, employees must be able

to immediately recognise and report such shortcomings to enable timely problemsolving and, if necessary, a product recall.

Employees must act within their range of authority and knowledge regarding product quality, which also includes only communicating to customers or consumers regarding product quality after internal prior approval.

### Working towards a sustainable future

Zwanenberg strives to produce sustainably. Zwanenberg adheres to all applicable legislation and is committed to achieve substantial reductions in greenhouse gas emissions, in line with the climate goals of the Paris Agreement. Suppliers are asked to help contribute to a sustainable future. We all need to adapt the way we produce and prepare food if we want to feed a growing world population while using less raw materials and resources. All employees and partners are urged to consider the environmental impact of their business decision making, and to actively identify actions and set targets to minimise food waste, reduce CO<sub>2</sub> emissions, and increase momentum for

plant-based food production.

There are several initiatives within the Zwanenberg Food Group to reduce the use of water and energy per produced kg, to reduce waste, to minimise packaging materials, and to recycle. Suppliers are encouraged to develop similar initiatives. There should be active communication towards employees on how they can contribute to sustainability.

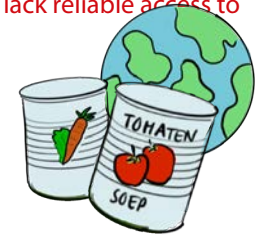
### Contributing to food security

It is estimated that one-third of all food worldwide is thrown away<sup>3</sup> all while hundreds of millions of people are not food secure<sup>4</sup> and lack reliable access to a sufficient quantity of affordable, nutritious food.

Zwanenberg is in a unique position to help increase food security. Whereas the company historically focused on meat, it has now diversified its focus by including vegetarian, vega(n) and canned products.

Canned products have a long shelf life and do not require refrigeration, which leads to less food waste as products are less likely to spoil. Canned products are relatively affordable and easily reach people who live in more remote areas, which are sometimes also economically less prosperous. An additional benefit of canned foods is that we can also process high quality ingredients that are merely aesthetically inferior, which again reduces food waste.

Employees and suppliers are encouraged to jointly strive for ways to further improve shelf life and therefore food security.



<sup>3</sup> *Food wastage footprint: Impacts on natural resources*, Food and Agriculture Organisation of the UN

<sup>4</sup> *The State of Food Security and Nutrition in the World 2022*, Food and Agriculture Organisation of the UN

## How to treat animals

Zwanenberg stands for animal welfare. All suppliers are obligated to respect animal welfare and the integrity of animals in the operations. This means, among other things:

- Animals must be healthy, free from pain, injury or disease. Any sick, injured or distressed animals should receive appropriate (veterinary) treatment.
- Animals must have access to adequate feed and fresh water.
- Animals must be free to express natural behaviours that are important for their physical and mental health. To this purpose they must be provided with sufficient and adequate space, sufficient other animals from their own species for their social needs, and sufficient facilities.
- Animals must not be kept in permanent darkness or brightness.
- Buildings that house animals must have adequate climate, ventilation, and manure management practices and should be cleaned and disinfected thoroughly to minimise risk of disease.
- Employees must be adequately trained for their tasks.
- Every employee is expected to be fully aware of their obligation to respect animal welfare.
- Any misconduct or malfunctioning equipment should be reported.



## How to conduct business

### Competing with integrity

Zwanenberg competes in a fair and honest way and adheres to competition law. Employees and suppliers are expected to conduct business accordingly. Bribery, intentionally providing false information, threats, or any other unfair practice to influence government officials, suppliers, customers or other third parties in their decision-making is strictly prohibited. Gifts above a monetary value of €50,00 should be reported to a manager. Inappropriate financial reporting, manipulating or circumventing internal controls, or any conduct detrimental to Zwanenberg is strictly prohibited.

Situations that are possibly fraudulent, dishonest, corrupt, unlawful in any other way, or not in line with doing business with integrity can be reported through the whistleblower procedure which can be found on the Zwanenberg website.

### Handling (potential) conflicts of interest

Conflicts of interest arise where an employee's obligation to act in the company's best interest is impeded by personal interests (financial or otherwise) or personal relationships. Employees should be aware of such situations and avoid behaviour that can constitute a conflict between the interests of the company and their personal interests, or can be perceived as such by others.

Business transactions with parties in which they themselves, their family members, or their personal contacts have a financial or managerial interest always need explicit prior approval by management. Prior written approval by management is also required for employees to take up external positions ('nevenfuncties'), either paid or unpaid, or to start a business of their own. Similarly, where employees personally own, or intend to own, shares in another company that may give rise to a conflict of interest they should report this to their manager. As a general rule, in case of doubt the issues should be escalated to the employee's direct supervisor.

### Handling confidential data

Zwanenberg is committed to protecting all business related and personal data. In order to be a trustworthy and reliable business partner, it is key to protect everyone's personal or commercial data, trade secrets, know-how, intellectual or industrial property and other confidential information processed by the company, or shared with the company by suppliers, customers, business partners and others. Zwanenberg ensures that confidential information is adequately protected against destruction, loss, alteration, unauthorised disclosure or unauthorised access (whether accidental or unlawful) and that confidential data is not used for any purpose other than for which it was collected or provided, unless this is required by law, on court order or with the rightful party's prior consent. All suppliers, customers and other business partners are expected to do the same.

Business partners are required to comply with all applicable laws and regulations relating to data protection and data processing, and any relevant contractual terms. They are expected to handle all confidential information with care and protect it from misuse, and to protect this data not only during the time of co-operation but also after the co-operation ends. They are expected to safeguard their own digitally stored data by applying appropriate cybersecurity mechanisms and other technical and organisational measures.



ZWANENBERG

EASY CHICKEN TONIGHT

Kips

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